

1 RENE L. VALLADARES
2 Federal Public Defender
3 State Bar No. 11479
4 RAQUEL LAZO
5 Assistant Federal Public Defender
6 State Bar No. 8540
7 411 E. Bonneville Avenue, Suite 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

2:13-cr-217-APG-PAL

10 Plaintiff,

**STIPULATION TO CONTINUE
SENTENCING DATE**

11 vs.

(Second Request)

12 THOMAS KENNISTON,

13 Defendant.

14
15 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United
16 States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the United States
17 of America, and Rene L. Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant
18 Federal Public Defender, counsel for THOMAS KENNISTON, that the sentencing and disposition
19 currently scheduled for Monday, June 29, 2015 at the hour of 10:00 a.m., be vacated and set to a date
20 and time convenient to this Court but no earlier than sixty (60) days.

21 This Stipulation is entered into for the following reasons:

22 1. Mr. Kenniston has additional questions regarding the presentence investigation report.
23 He resides in San Diego, California. Defense counsel plans on traveling to California and visiting
24 him during the week of June 15, 2015.

25 2. The plea agreement allows Mr. Kenniston to seek a non-custodial sentence.
26 Additional time is needed to complete the sentencing memorandum in this case.

27 ///

28 ///

1 3. Mr. Kenniston is asking for additional time to gather enough money for airfare and
2 hotel expenses related to his travel from San Diego to Las Vegas for the hearing. He recently
3 suffered some financial hardships and could use the additional time to save for such expenses.

4 4. Finally, defense counsel will be in trial in United States v. Warras, District Court Case
5 No. 2:13-cr-439-LDG-VCF. The trial is expected to last approximately two (2) weeks. As such,
6 defense counsel requests the hearing be continued until the end of August 2015.

7 5. The defendant is not incarcerated and agrees to the continuance in this matter.

8 6. This is the second stipulation to continue filed herein.

9 DATED this 12th day of June, 2015.

10
11 RENE L. VALLADARES
12 Federal Public Defender

13 DANIEL BOGDEN
14 United States of Attorney

15
16 By: /s/ Raquel Lazo
17 _____
18 RAQUEL LAZO,
19 Assistant Federal Public Defender

20
21 By: /s/ Susan Cushman
22 _____
23 SUSAN CUSHMAN,
24 Assistant United States Attorney

25
26
27
28

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

2:13-cr-217-APG-PAL

4 Plaintiff,

ORDER

5 vs.

6 THOMAS KENNISTON,

7 Defendant.

8

9 **ORDER**

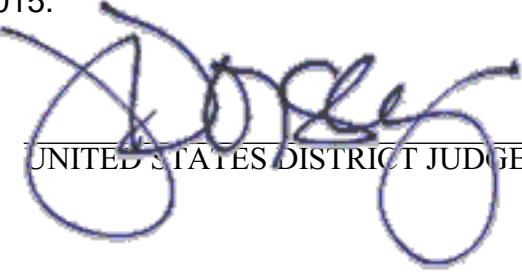
10 Based on the pending Stipulation of counsel, and good cause appearing,

11 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Monday,

12 June 29, 2015 at the hour of 10:00 a.m., be vacated and continued to Wednesday, September, 9, 2015,

13 at 10:00 a.m.

14 DATED this 22nd day of June, 2015.

15 
16 UNITED STATES DISTRICT JUDGE

17

18

19

20

21

22

23

24

25

26

27

28